

MELANIE A. HILL  
Nevada Bar No. 8796  
**MELANIE HILL LAW PLLC**  
1925 Village Center Circle, Ste. 150  
Las Vegas, Nevada 89134  
Tel: (702) 362-8500  
Fax: (702) 362-8505  
Email: [Melanie@MelanieHillLaw.com](mailto:Melanie@MelanieHillLaw.com)  
*Attorneys for Plaintiff Augustine Calleros, Jr.*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

AUGUSTINE CALLEROS, JR.,

Plaintiff,

vs.

CITY OF NORTH LAS VEGAS, a municipal  
corporation,

Defendant.

CASE NO.: 2:23-cv-01340-GMN-DJA

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO RESPOND  
TO DEFENDANT'S MOTION FOR  
SUMMARY JUDGMENT [ECF No. 44]**

(First Request)

Plaintiff, Augustine Calleros, Jr. ("Calleros"), by and through his counsel, Melanie Hill Law, and Defendant City of North Las Vegas ("CNLV"), by and through its counsel, Madison Zornes-Vela, hereby stipulate to extend the deadlines for Mr. Calleros to respond to the City of North Las Vegas's Motion for Summary Judgment filed on August 28, 2024 [ECF No. 44] from the current deadline of September 18, 2024 to October 18, 2024. This Stipulation is made at the request of Plaintiff's counsel for the reasons set forth herein. This is the first request to extend the deadline to respond to this dispositive motion.

In support of this Stipulation and Order, the parties state as follows:

1. The current deadline to respond to the City of North Las Vegas's Motion for

1 Summary Judgment filed on August 28, 2024 [ECF No. 44] is September 18, 2024. The parties have  
2 agreed to extend the deadline thirty days from the current deadline of September 18, 2024.

3 2. Counsel for Plaintiff reached out to counsel for Defendant requesting the thirty-day  
4 extension of the response deadline and the parties have agreed to the requested extension.

5 3. This stipulation to extend the dispositive motion deadlines is brought in good faith, with a  
6 showing of good cause, and is not sought for any improper purpose or other purpose of delay, but to  
7 allow counsel for the Plaintiff the additional time requested to respond to the dispositive motion in  
8 light of her other pending deadlines in her other federal cases, one of which is against the same  
9 defendant in this case and counsel is currently responding to a dispositive motion in that case that is  
10 due on September 28, 2024.  
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1 WHEREFORE, the parties respectfully request by this stipulation that the Court extend the  
2 deadlines for Mr. Calleros to respond to the City of North Las Vegas's Motion for Summary Judgment  
3 filed on August 28, 2024 [ECF No. 44] from the current deadlines of September 18, 2024 to October  
4 18, 2024.

5 DATED this 12th day of September, 2024.

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7 Respectfully submitted,

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9 MELANIE HILL LAW PLLC

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11 /s/ Melanie Hill

12 Melanie A. Hill, Esq. (NV Bar No. 8796)  
13 1925 Village Center Circle, Suite 150  
14 Las Vegas, NV 89134  
15 Tel.: (702) 362-8500  
16 Fax: (702) 362-8505  
17 Melanie@MelanieHillLaw.com  
18 *Attorney for Plaintiff Augustine Calleros, Jr.*

Respectfully submitted,

NORTH LAS VEGAS CITY ATTORNEY

/s/ Madison Zornes-Vela

Madison Zornes-Vela, Esq. (NV Bar No. 13626)  
2250 Las Vegas Blvd., N., Suite 810  
North Las Vegas, Nevada 89030  
Tel: (702) 633-1057  
Fax: (702) 649-8879  
zornesvelam@cityofnorthlasvegas.com  
*Attorney for Defendant City of North Las Vegas*

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18 IT IS SO ORDERED:

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22 GLORIA M. NAVARRO  
23 UNITED STATES DISTRICT JUDGE

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27 Dated: September 19, 2024  
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